

**VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
LYNCHBURG SATELLITE OFFICE**

**FACT SHEET
FOR PROPOSED PERMITTING ACTION
UNDER 9 VAC 5 Chapter 80 Article 1 (TITLE V-CLEAN AIR ACT)**

APPLICANT:

VA-30823
Intertape Incorporated
P. O. Box 3367
Danville, VA 24543-3367

AIRS ID 51-143-0109

FACILITY LOCATION:

1101 Eagle Springs Road, Danville, VA 24540
UTM Coordinates are ZONE: 17 EASTING: 648.2 km NORTHING: 4052.0 km

FACILITY DESCRIPTION:

Intertape Incorporated is a manufacturer of adhesive tape and stretch film covered by Standard Industrial Classification (SIC) Code 3089. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week, fifty-two (52) weeks per year. The facility manufactures polypropylene based adhesive tape and polyethylene based stretch film. Both coating lines are subject to NSPS Subpart RR. The toluene storage tanks are not subject to NSPS Subpart Kb because they are below the exemption level of 40 cubic meters (10,567 gallons). Toluene is not on the list of regulated substances for 112(r). The facility obtained a permit to modify on March 10, 2000, and has not completed the initial performance test for the modification, which explains the wording of Conditions IV.A.4, IV.A.8, IV.C.2, and IV.D.1.

EMISSIONS SUMMARY:

PLANTWIDE EMISSIONS SUMMARY [TONS PER YEAR]		
CRITERIA POLLUTANTS	POTENTIAL EMISSIONS	1998 ACTUAL EMISSIONS
Particulate Matter (PM10)	13	0.5
Nitrogen Oxides (NOx)	15.6	5.0
Sulfur Dioxide (SO ₂)	-	-
Carbon Monoxide (CO)	6.2	2.0
Volatile Organic Compounds (VOC)	241	89.7
HAZARDOUS AIR POLLUTANTS	POTENTIAL EMISSIONS	1998 ACTUAL EMISSIONS
Toluene	241	89.7

TITLE V PROGRAM APPLICABILITY BASIS:

This facility has the potential to emit 241 tons per year of VOCs and 241 tons per year of toluene. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant and 10 tons per year of a HAP, Intertape Polymer Group is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 9 VAC 5 Chapter 80 Article 1.

LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS:

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the Commonwealth of Virginia Federal Operating Permit Regulations for the purposes of Title V of the Federal Clean Air Act (9 VAC 5 Chapter 80 Article 1), and underlying applicable requirements in other state and federal rules. Applicable requirement means all of the following as they apply to emission units in a Title V source:

- a. Any standard or other requirement provided for in the State Implementation Plan or the Federal Implementation Plan, including any source-specific provisions such as consent agreements or orders.
- b. Any term or condition of any preconstruction permit issued pursuant to 9 VAC 5-80-10, Article 8 (9 VAC 5-80-1700 et seq.) of this part or 9 VAC 5-80-30 or of any operating permit issued pursuant to 9 VAC 5 Chapter 80 Article 5, except for terms or conditions derived from applicable state requirements or from any requirement of these regulations not included in the definition of applicable requirement.
- c. Any standard or other requirement prescribed under these regulations, particularly the provisions of 9 VAC 5 Chapter 40 (9 VAC 5-40-10 et seq.), 9 VAC 5 Chapter 50 (9 VAC 5-50-10 et seq.) or 9 VAC 5 Chapter 60 (9 VAC 5-60-10 et seq.), adopted pursuant to requirements of the Federal Clean Air Act or under § 111, 112 or 129 of the federal Clean Air Act.
- d. Any requirement concerning accident prevention under § 112(r)(7) of the federal Clean Air Act.
- e. Any compliance monitoring requirements established pursuant to either § 504(b) or § 114(a)(3) of the Federal Clean Air Act or these regulations.
- f. Any standard or other requirement for consumer and commercial products under § 183(e) of the Federal Clean Air Act.
- g. Any standard or other requirement for tank vessels under § 183(f) of the Federal Clean Air Act.
- h. Any standard or other requirement in 40 CFR Part 55 to control air pollution from outer continental shelf sources.

- i. Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the Federal Clean Air Act, unless the administrator has determined that such requirements need not be contained in a permit issued under this article.
- j. With regard to temporary sources subject to 9 VAC 5-80-130, (i) any ambient air quality standard, except applicable state requirements, and (ii) requirements regarding increments or visibility as provided in Article 8 (9 VAC 5-80-1700 et seq.) of this part.
- k. Any standard or other requirement of the acid deposition control program under Title IV of the Clean Air Act or the regulations promulgated thereunder.
- l. Any standard or other requirement governing solid waste incineration under § 129 of the Clean Air Act.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 9 VAC 5 Chapter 80 Article 1 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the state but is not Federally-enforceable is identified in the draft Title V permit as such.

REQUEST FOR VARIANCES OR ALTERNATIVES:

None

PERIODIC MONITORING

NSPS Subpart RR requires the permittee to maintain records of solvent applied and to calculate the VOC emission rate using the procedures described in the Subpart. These requirements have been incorporated in the permit. Periodic monitoring for the operation of each coating line will be performed as follows:

- Initial performance tests shall be conducted for each coating line to demonstrate compliance with the VOC emission standard in the Subpart/permit. Each performance test shall be conducted as follows:
 - a. each performance test shall be a one calendar month test
 - b. the weighted average mass of VOC applied per mass of coating solids applied for a one calendar month period shall be determined as specified in 60.443(a)(1) and (2). If this value is less than 0.2 kg VOC applied per kg of coating solids applied, the coating line is in compliance. If not, calculate the required percent overall VOC emission reduction as specified in 60.443(b) or (c), as appropriate.
 - c. to determine the mass of VOC applied and recovered by installing, calibrating, maintaining, and operating a monitoring device for indicating the cumulative amount of VOC applied to each coating line and recovered by each carbon adsorption system during each calendar month. Each monitoring device shall be accurate within +/- 2 percent.

- Intertape shall calculate a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period as specified in Subpart RR. For each coating line where the value of G is less than or equal to 0.20 kg VOC per kg of coating solids applied, the coating line is in compliance with the Subpart; or
- Intertape shall calculate the required overall VOC emission reduction (R_q) as specified in Subpart RR. If R_q is less than or equal to 90 percent, then the required overall VOC emission reduction is R_q. If R_q is greater than 90 percent, then the required overall VOC emission reduction is 90 percent.
- Intertape shall determine the overall VOC emission reduction (R) for each calendar month for each coating line as specified in Subpart RR. If the R value is equal to or greater than the R_q value calculated above, then compliance is demonstrated.
- A separate compliance test is completed at the end of each calendar month after the initial performance test, and a new calendar month's average VOC emission reduction is calculated to show compliance with the standard.
- Following the initial performance test, Intertape shall submit quarterly reports to the LSO of exceedances of the VOC emission limits for each coating line. If no such exceedances occur during a particular quarter, a report stating this shall be submitted semiannually.

Periodic monitoring for the carbon adsorbers consists of developing a maintenance schedule and maintaining records of all scheduled and non-scheduled maintenance, and maintaining an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns. Each of the carbon adsorption systems shall be equipped with a device which continuously measures the VOC concentration of the exhaust gas in ppmv to indicate breakthrough. Intertape shall maintain records of the manufacturer's recommendations for carbon bed replacement and records of actual carbon bed replacement.

Compliance with the annual emission limits shall be determined by material balance each calendar month as follows: add toluene purchases to opening toluene inventory in gallons and subtract from purchases the closing toluene inventory and the amount of toluene disposed of off site, in gallons. The toluene losses each month are determined by converting the result to tons.

A no permit required determination was made for the stretch film manufacturing (consisting of three cast extrusion and four blown extrusion lines for polyethylene film, ten resin storage silos and a repellitizer) on October 18, 1995, since PM and VOC emissions are below the exemption rates in state regulations. Total PM emissions are less than 3 tons per year, and total VOC emissions are less than 5 tons per year. These emissions are included with the total facility emissions reported annually. At capacity, PM emissions are calculated to be 0.25 pounds per hour (2500 pounds extruded $\times 1 \times 10^{-4}$ lb PM/lb extruded), which is below the allowable rate of 2.91 pounds per hour. Periodic monitoring

consists of tracking the amount of material extruded, and emissions will be determined by applying the same emission factor used in the no-permit determination.

COMMENT PERIOD:

The public notice appeared in the *Register and Bee* on May 21, 2000.

Beginning Date: May 21, 2000

Ending Date: June 20, 2000

All written comments should be addressed to the following individual and office:

Department of Environmental Quality
Lynchburg Satellite Office
7705 Timberlake Road
Lynchburg, VA 24502
Phone: (804) 582-5120 Fax: (804) 582-5125

PROCEDURE FOR REQUESTING PUBLIC HEARING:

During the public comment period any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for a public hearing shall be in writing to the above address and shall state the nature of the issues proposed to be raised in the hearing. The Director shall grant such a request for a hearing if he concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.